



California Regional Water Quality Control Board

Los Angeles Region



Terry Tamminen
Secretary for
Environmental
Protection

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**SFUND RECORDS CTR
2192619**

March 15, 2004

Ms. Kay Leiker
32181 Sail View Lane
Westlake Village, CA 91361

**REQUIREMENT FOR A TECHNICAL INVESTIGATION REPORT PURSUANT TO
CALIFORNIA WATER CODE SECTION 13267 – K & L ANODIZING CORPORATION,
1200 S VICTORY BLVD. , BURBANK, CALIFORNIA (FILE NO. 110.0622)**

Dear Ms. Kay Leiker:

The California Regional Water Quality Control Board, Los Angeles Region, ("Regional Board") is the public agency with primary responsibility to protect groundwater and surface water quality within the Coastal Watershed of Los Angeles and Ventura Counties. This Regional Board and the United States Environmental Protection Agency (US EPA) Region IX, under the Well Investigation Program (WIP) in San Fernando Valley Groundwater Basin (SFVGB), jointly conducted a chromium VI investigation between November 1998 and December 2001.

Chromium is a metallic element widely used in a variety of industrial applications such as aerospace, aircraft part, multi-purpose plating and jewelry manufacturing and it is also present in the SFVGB. Chromium concentrations exceed current safe drinking water standards at some locations and do pose an ongoing threat to the drinking water resources of the SFVGB. The California Maximum Contaminant Level (MCL) for total chromium in drinking water is currently 50 parts per billion (ppb).

At the onset of the chromium VI investigation, we sent out 255 letters in late 2000 to property owners, tenants, companies and individuals informing them that their facility or site, previously closed under the 1986 to 1996 US EPA Superfund investigations, may be re-opened.

As you may recall, the objectives of the Superfund investigations were to:

1. Identify sources of chlorinated volatile organic compounds (VOCs),
2. Characterize the extent of contamination in the soil and groundwater, to
3. Remediate these contaminants, and to
4. Reduce and eliminate the public health threat posed to water quality degradation impacting public drinking water supply wells.

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New information provided to the Regional Board from the Upper Los Angeles River Area (ULARA) Watermaster indicates that some of the groundwater supply wells in the SFVGB have been contaminated by heavy metals, including hexavalent chromium (chromium VI). Upon receiving this information, we re-evaluated the Chemical Use Questionnaire (CUQ) provided by each facility from the Superfund investigation to determine which facilities stored and/or used chromium compounds, including chromium VI.

Based on the results of the CUQ review, a site inspection was then conducted by Regional Board staff to verify the CUQ information. The follow-up inspection findings and subsequent technical report entitled *The San Fernando Valley Chromium VI Investigation Report* (Phase I) written by the Regional Board staff were performed pursuant to provisions in Division 7, Chapter 4, Article 4, Section 13267 of the California Water Code. In summary, this technical report recommended that 112 sites out of the 255 suspected sites identified, warranted further investigation. More information regarding our investigation is available on the Regional Board's web-site:

http://www.swrcb.ca.gov/rwqcb4/html/water_qty/chromium6report_order.html

Your site is one of those facilities requiring further subsurface investigation *Phase II of the San Fernando Valley Chromium VI Investigation* is now set to begin. This phase will require site assessment to be performed at all of the 112 sites identified above, including yours, to determine the nature and extent of contamination in soil from past (or present) useage, storage, treatment and/or disposal of heavy metals. With respect to the current chromium VI, and other heavy metal investigations, we have reviewed the case file and inspection report(s) for your site and have determined that chromium compounds were used and stored on-site in the past or at present. Refer to the inspection report completed by Regional board staff (enclosed).

If the subsurface investigation to be completed at your site detects soil contamination, then, follow-up assessment work in the form of additional soil investigation and/or groundwater assessment shall be required. In the event that we find only background or levels of heavy metal constituents, this may warrant low risk review and granting final case closure after a review of the completed Phase II soil assessment report.

INVESTIGATIVE AUTHORITY

For your information, the United States Congress passed the *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)* in 1980 to protect public health and the environment through the investigation and remediation of sites contaminated with hazardous substances. CERCLA, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986 granted US EPA the authority to require those responsible for the (environmental) contamination to pay for and/or participate in the investigation and cleanup effort. California's Porter-Cologne Act (a.k.a. California Water Code) provides the Regional Board with similar authority. Presently, the US EPA and the Regional Board are using their joint



enforcement authority to investigate and remediate sources of contamination that are or maybe polluting the eastern SFVGB soils and/or groundwater. The current chromium investigation, lead by this Regional Board, is focused on identifying sites that are contributing to chromium contamination in the eastern SFVGB.

REQUIREMENTS

Therefore, Regional Board is requiring you to do the following, pursuant to Section 13276 of the California Water Code:

1. Submit a subsurface soil technical report (hereinafter called investigation workplan) by **May 15, 2004**. A guidance document entitled "*General WorkPlan Requirements for a Heavy Metal Soil Investigation*" in order to assist you in developing the investigation workplan is enclosed (Attachment A and B). Additional information can be found in our guidance manual entitled "*Interim Site Assessment & Cleanup Guidebook (May1996)*," which can be found at the Regional Board web-site at: <http://www.swrcb.ca.gov/rwqcb4>. The workplan must include a health and safety plan (H&SP) and must target current or former heavy metals, including chromium storage, treatment, plating, processing and waste disposal areas, using our attached guidance documents.
2. Pursuant to State Water Resources Control Board Resolution No. 92-49, under California Water Code Section 13304, all fieldwork related to implementing the required workplan (technical report) such as well installation(s) must be conducted by, or under the direct responsible supervision of, a registered geologist or licensed civil engineer. All technical documents submitted to this Regional Board must be reviewed, signed and stamped by a California registered geologist, or a California registered civil engineer with at least five years hydrogeologic experience. Furthermore, the California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Therefore, all future work must be performed by or under the direction of a registered geologist or registered civil engineer. A statement is required in the report that the registered professional in responsible charge actually supervised or personally conducted all the work associated with the project.

Pursuant to Section 13268 of the California Water Code, failure to submit the required technical report by the due date may result in administrative civil liability imposed fine being assessed by the Regional Board, in an amount up to one thousand dollars (\$1,000) for each day the report or document is not received after **May 15, 2004**.

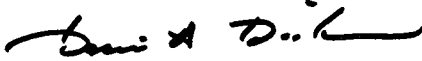
Please withhold implementation of your workplan until Regional Board staff has granted approval. **If you have any questions regarding this matter, please call Mr. Mohammad Zaidi at (213) 576-6732 or Mr. Dixon Oriola at (213) 576-6803.**

Ms. Kay Leiker

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March 15, 2004

Sincerely,



Dennis A. Dickerson
Executive Officer
Enclosures:

1. Facility Inspection Report
2. General Workplan Requirements for a Heavy Metal Soil Investigation (Appendix A)
3. QA/QC Requirements for Title 22 Metals Analysis (Appendix B)

cc: Ms. Vera Melnyk Vecchio, California Department of Health Services
Ms. Sayareh Amirebrahimi, Department of Toxic Substances Control
Mr. David Stensby, U. S. Environmental Protection Agency, Region IX
Mr. Mark Mackowski, Upper Los Angeles River Area Watermaster
Mr. Donald R. Froelich, City of Glendale
Mr. Roger Baker, City of Burbank Planning Department
Mr. Fred Lantz, City of Burbank Water Supply Department

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